

UNITED STATES DISTRICT COURT

for the
Western District of Oklahoma

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*ELECTRONIC DEVICE: A SAMSUNG SM-S506DL
(GALAXY A50) CELL PHONE BEARING IMEI
357857102584226

Case No. MJ-23-501-STE

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A, which is attached and incorporated by reference.

located in the Western District of Oklahoma, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, which is attached and incorporated by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. s.2252A(a)(5)(B)	Possession of Child Pornography
18 U.S.C. s. 2252A(a)(2)	Distribution of Child Pornography
18 U.S.C. s. 2422(b)	Enticement
18 U.S.C. s. 2423(b)	Travel with Intent to Engage in Illicit Sexual Conduct

The application is based on these facts:

See attached Affidavit of FBI Special Agent Marisol Flores, which is incorporated by reference herein.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Applicant's signature*

Marisol Flores, SA, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: Jul 5, 2023*Judge's signature*City and state: Oklahoma City, Oklahoma

SHON T. ERWIN, U.S. MAGISTRATE JUDGE

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Marisol Flores, a Special Agent with the Federal Bureau of Investigation (FBI), Oklahoma City, Oklahoma, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since May 2015 and have been assigned to the Oklahoma City FBI Field Office. During that time, I have conducted a wide variety of investigations, including numerous cases involving child pornography and sexual exploitation of children.
2. As a Special Agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.
3. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers and witnesses, and review of documents and records. This affidavit is made in support of an application for a warrant to search a cell phone collected from Chad Quinnell's person incident his arrest (hereinafter referred to as "the Target Device"), which is described in detail in Attachment A to this affidavit, for the items specified in Attachment B hereto, which constitute instrumentalities, fruits, and evidence of violations of 18 U.S.C. §§ 2252A(a)(5)(B) (possession of child pornography), 2252A(a)(2) (distribution of child pornography), 2422(b) (enticement), and 2423(b) (travel with intent to engage in illicit sexual conduct).
4. This investigation, described more fully below, has revealed that Chad

Quinnell (“QUINNELL”) utilized his cell phone to distribute child pornography in violation of 18 U.S.C. § 2252A(a)(2), possessed material containing child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B), knowingly attempted to persuade, induce, entice, and coerce a minor to engage in sexual activity in violation of 18 U.S.C. § 2422(b), and traveled in interstate commerce with intent to engage in illicit sexual conduct in violation of 18 U.S.C. § 2423(b). There is probable cause to believe that evidence, fruits, and instrumentalities of such violations are located on the Target Device.

5. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to support the issuance of a search warrant.

IDENTIFICATION OF THE DEVICE TO BE EXAMINED

6. The property to be searched is a Samsung SM-S506DL (Galaxy A50) cell phone bearing IMEI 357857102584226, hereinafter the “Target Device.” The Target Device is currently located at 3301 W. Memorial Rd., Oklahoma City, Oklahoma 73134.

7. The applied-for warrant would authorize the forensic examination of the Target Device for the purpose of identifying electronically stored data particularly described in Attachment B.

PROBABLE CAUSE

I. Complaint

8. On June 28, 2023, a sealed criminal complaint was issued against QUINNELL in the Western District of Oklahoma charging QUINNELL with distributing

child pornography in violation of 18 U.S.C. § 2252A(a)(2)(A). On the same day, a federal arrest warrant was issued for QUINNELL.

9. The probable cause underlying the complaint is relayed in paragraphs 10 through 22 below.

10. On or about January 31, 2023, I, working in an undercover capacity, was contacted by QUINNELL through a website on the Internet called FetLife.¹ QUINNELL used the FetLife profile username, “Berserker_”, and posted a photo of himself on his profile. After communicating on FetLife, QUINNELL communicated with me via SMS text messaging, utilizing phone number 530-715-4841, and an online messaging application that uses the Internet called Wire,² using profile name, “thegodofnone.”

11. QUINNELL was identified as the user of “Berserker_” on the FetLife website, the user of phone number 530-715-4841, and the user of “thegodofnone,” through QUINNELL’s own statements made during the chats, open-source checks, as well as sending several photos of himself to me, which investigators matched to QUINNELL’s driver’s license photo.³

¹ FetLife is described on its website as “the Most Popular Social Network for the BDSM, Fetish & Kinky Community,” with its mission stating, “To help people feel comfortable with who they are sexually.”

² Wire is described on its website as “Secure communication for the highest security demands.” And, it states, “End-to-end encrypted messaging, conferencing, file exchange, and more.”

³ During the chats, “Berserker_” stated he was a “46 M”, and to “Contact me Text: 530-715-4841 Wife & Telegram: @thegodofnone Kik: man_about_town77 Names Chad.” During the SMS texts between myself and phone number 530-715-4841, the user of phone number 530-715-4841 sent three photos depicting his face. Those three face photos were

12. On or about January 31, 2023, QUINNELL, utilizing username “Berserker_”, sent a FetLife direct message to me saying, “How are you today? I like your profile and I would like to chat. I saw you in the sex with mother and daughter group. Check out my profile and if you have any questions or likes please hit me back. Thank you for your time. I hope to hear from you soon.”

13. On or about June 16, 2023, I replied, “more into real life taboos ... if that’s what you are into.” QUINNELL said, “I very much am into real life taboo and looking for other into real life alsom [...] I really want a naughty incest family. Taught sex from day 1. On or about June 17, 2023, QUINNELL said, “I would love to talk off here in more detail if you are willing. I can text, telegram, wire and kik. [...] Contact me Text: 530-715-4841 Wife & Telegram: @thegodofnone Kik: man_about_town77 Names Chad.” On or about June 21, 2023, I replied, “i’ll send you a text.”

14. On or about June 21, 2023, I sent an SMS message to QUINNELL, utilizing phone number 530-715-4841, saying, “Hi Chad.” QUINNELL later asked me, “And what’s your real life taboos? Don’t hold back [...] Few limits here. Very into incest family, beast and bathroom. You?” I replied, “I’m into watching my kids have fun with the men in my life.” QUINNELL then said, “Our kinks line up.” When QUINNELL asked me what ages my daughters were, I replied, “9 and 12 [...] every been with littles?”, to which

compared to QUINNELL’s driver’s license photo, which was a match. Phone number 530-715-4841 also sent a message saying, “Look me up, Chad quinnell.” Open-source checks also show QUINNELL having phone number 530-715-4841. QUINNELL’S criminal history revealed a 2013 conviction in California for arranging to meet with a minor.

QUINNELL said, “Perfect ages to fuck [...] Yes. I have many times.” QUINNELL then stated his intentions when he texted, “I’d like to breed the older daughter [...] They get used much? [...] I fuck her every day tel pregnant. Then keep her home and home birth. Then breed her again. And then milk her.” QUINNELL continued, “Ideally I want them as my breeders [...] Raise the family together sexually. All the generations [...] And I’m actually serious about this.”

15. When I clarified, “I’m not into men myself [...] Is that a deal breaker,” QUINNELL answered, “No. I know another mother daughter combo who we can join and the mom loves women to.” As QUINNELL and I discussed the lifestyle of sexual acts with minors, QUINNELL asked, “May i see your daughter’s bodies?” to which I replied, “We don’t do pics or vids bc we got burned last year.” QUINNELL commiserated saying, “I know the feeling. I’ve been there [...] Yes really. Honesty did time for it [...] Craigslist meet said 15 and I said ok, it was a bust.”⁴ Later in the chat, when I asked QUINNELL what he would teach the girls, he replied, “Teach them sex, oral, vaginal and anal. Then teach them mindset of serving me and being breeders.”

16. On or about June 22, 2023, QUINNELL sent an SMS message to me saying, “So if I said, I’m going to be part of a family and we will live like we want. Would you and the girls be interested in joining?” QUINNELL went on to describe living with several other adults and one minor, “Me, a mom and daughter, and another woman and man. I breed them all and raise the kids how we like.”

⁴ QUINNELL’S criminal history revealed a 2013 conviction in California for arranging to meet with a minor.

17. On June 23, 2023, QUINNELL told me via SMS message, "I was hoping to meet you one day." I replied, "Me or the girls?" QUINNELL clarifies, "Meet you and play with them [...] Wish I know you better. I would ask to play with the girls." I then asked, "What would you do with them?" QUINNELL answered, "Eat them. Touch them, finger them and sex if possible." During the chats I re-stated the ages of the daughters and named them, "Steph is 12, Cori is 9." QUINNELL then began using their names as he described his desire to be with the girls sexually, "Cori if stretched a bit could explore a bit. But takes time. [...] Can I admit I would love to breed Steph?" Later, QUINNELL explained he had plans to meet an adult female in Florida who was, "28, 3 girls, 3, 3, and 2 and expecting. She's naughty like us and bi." QUINNELL invited me to, "Come visit when I settle [...] Maybe talk breeding Steph." QUINNELL later told me, "Let cori rub over my cock and see what she can take."

18. I then asked QUINNELL, "Before we do our bedtime routine Tell me what your bedtime routine is," to which QUINNELL replied, "Mine alone is lots of masturbating. Haha. Would love to tuck them each in with sex." I asked, "What do u masterbate to." QUINNELL answered, "Usually pregnant, or kiddie." I went on, "What kiddie porn do u get off to," and QUINNELL said, "Many kinds. Kids and kids to kids and adults." When I described the difficulty of looking on the dark web, in reference to child pornography, QUINNELL stated, "It's not easy. Plus never send by anything not encrypted." I responded, "I like texting, but I do have wire for whenever [...] Just don't check it that often." QUINNELL then provided me with his username on Wire, "@thegodofnone [...] Hit me up there later."

19. I connected with QUINNELL, who was utilizing username “thegodofnone” on Wire shortly thereafter. QUINNELL told me, “Sleep well,” and I replied, “cool name on here You to.” Then, at approximately 9:45pm CST, on June 23, 2023, QUINNELL sent the following message on Wire to me, “Something for your time ...” with a video attachment. The video is described as follows:

- Video: 6B3CD157-E913-4298-8438-9FE309635FD4, MP4 format, 5.3 MB in size and 2:00 in length; depicts an adult female and prepubescent female lying on what appears to be a bed with pink sheets. Neither of the females is wearing any clothes, and the adult female is on her knees crouched down and leaning over the prepubescent female, who is lying on her back with her arms and legs spread out to her sides. The adult female has her hands positioned on the thighs of the prepubescent female’s legs and, as the camera zooms in closer, the adult female places her mouth and tongue on the prepubescent female’s exposed vagina, making kissing noises as she does so. As the video continues, the adult female uses her hands and fingers to further spread and expose the prepubescent female’s vagina, then engages in more kissing of the exposed vagina. Eventually, the prepubescent female rolls to her left side and the adult female uses her hand to spread and expose the prepubescent female’s anus and vagina.

20. On June 25, 2023, I told QUINNELL, via SMS message, to travel safe on a trip, to which QUINNELL replied, “Wish I was comming to you [...] Almost to 35, wish I was taking it to the girls.” I later said, “Oh, meant to tell you I finally got to check my

wire today and loved loved loved the vid. So hot [...] Thank you for sending, it was a wet treat this morning.” QUINNELL replied, “Wish I had more to offer you! Want more?” I never answered QUINNELL’s question, but said, “Just take care of my girls and I’ll be happy as a peach.” QUINNELL replied, “I would love living there and daily training. A man can wish.” Later in the chat, QUINNELL said, “Check wire for a treat.”

21. At approximately 3:44pm on June 25, 2023, QUINNELL, utilizing Wire username “thegodofnone” sent me a video attachment. The video is described as follows:

- Video: 33CAD3BC-0683-4333-AB03-1ED3A166892C, MP4 format, 8.5 MB in size and 1:18 in length (with the caption “telegram:@cp833” in the upper right corner of the frame); depicts what appears to be an adult female wearing panties and a prosthetic penis and kneeling on what appears to be a bed. Lying on her back to the front of the adult female, with her exposed vagina facing the adult female’s prosthetic penis, is a naked, prepubescent female. The prepubescent female has her legs bent at the knee with her thighs pressed against her chest. The adult female uses her hands, with red colored fingernails, to further press the prepubescent female’s thighs against her chest. The adult female then inserts the prosthetic penis into the prepubescent female’s exposed vagina and engages in vaginal sex. The prepubescent female appears to try to move to prevent the adult woman from further engaging in vaginal sex and makes distressing sounds with her mouth. In response, the adult woman uses her hands to further control the prepubescent’s arms and legs and then pulls her up to a sitting position.

While holding the prepubescent female in a sitting position on her lap, the adult female continues to engage in vaginal sex with the prepubescent female. As the video progresses, the adult female moves and positions the prepubescent female on her hands and knees so that her exposed vagina is facing the adult female's prosthetic penis. The adult female grabs a hold of the prepubescent female's rear end and moves it closer to her prosthetic penis and inserts it into the exposed vagina, engaging in more vaginal sex.

22. On both occasions that QUINNELL sent me the above-described videos, I was located in Oklahoma County, which is within the Western District of Oklahoma.

II. Subsequent Communications

23. During the SMS chats between myself and QUINNELL, QUINNELL expressed a desire to travel from another state to Oklahoma City to meet me and my fictitious minor daughters.

24. On June 28, 2023, I asked QUINNELL, "So what next?" QUINNELL answered, "We meet [...] See if we work this well in person." I went on to say, "Well, I'll have to see if the girls like you and like being with you. That's most important to me. [...] And I want to be able to explain to them all the things that'll happen when we all meet the first time." QUINNELL replied, "Ideally we do everything we can do. Steog feel me in her. Cori feel me rub all on her and see how much she can take. Steph." QUINNELL went on to say, "Can I see pics of you and the girls now? I'm debating leaving here tomorrow. Want to meet me tomorrow and if you like me spend the night?" I replied, "Wow, the girls will be so excited – I think I could take off a few hours." QUINNELL replied, "I'm about

8 hours away.” I said, “I can get off around 11am, could you be here around then.” QUINNELL answered, “I can’t be there that early with the drive. It would be more like 3pm.”

25. Later, during the evening of June 28, 2023, QUINNELL indicated to me that he would come to Oklahoma to meet on Friday, June 30, 2023, instead. He stated, “I need to be here tomorrow but Friday when off work let’s meet.” QUINNELL also stated he was in another state: “I’m in Jackson. Between Nashville and Memphis. Small town.”

26. Also on June 28, 2023, QUINNELL requested to communicate with Steph, the 12-year-old minor. QUINNELL, again utilizing cell phone number 530-715-4841, reached out to Steph via SMS message from June 28, 2023, to June 30, 2023, and I began communicating in an undercover capacity as the 12-year-old minor female. QUINNELL explained to me, acting as Steph, that he was coming to, “Meet, if you like me I would like to cuddle and kiss and if you like that make love.” He went on to say, “Our first time will be gentle and loving.” Later in the communications, he asked, “Would you like to help me try and have sex with cori?” I responded, “okay how”. QUINNELL replied, “Show her how with me. Then we patiently try with her.” When QUINNELL asked me, “You want me in you right away?” I answered, “idk would it hurt.” QUINNELL replied, “We can go slow. I can eat you and finger you first. Get you ready then go slow.”

27. When QUINNELL messaged, “Ask anything”, I messaged, “mom said u r bringing cori n me something, what is it”. QUINNELL answered, “It won’t be much but I’m still looking. Once we become family I want to but you, cori and mom matching necklaces.” I replied, “i love necklaces And bracelets.” QUINNELL responded, “I like

that. Cori like them to?" I answered, "yes." In later chats, QUINNELL told me, "Your mom won't really want me sexually so it's all about you and cori."

28. The morning of June 30, 2023, QUINNELL said to me, acting as Steph, "Good morning beautiful. Leaving here soon on my way to you." Several messages later, QUINNELL asked, "What are you wearing to meet me?" And later, he asked, "What would you like to do with me tonight?" To which, I replied, "have fun what do u want 2 do." QUINNELL answered, "Lots of sex with you and cori." QUINNELL went on to say, "Im so excited to meet you and cori today [...] Lets show cori how we have sex then let's help her have sex with me."

29. QUINNELL also continued to communicate via SMS messaging with who he believed was the mother of the two minor females. On June 30, 2023, QUINNELL said, "Good morning beautiful. Leaving here soon." Later he said, "I've hit a lot of traffic but I will be there. GPS says 4." QUINNELL asked, "Think cori would want to try sex? [...] How many fingers can you get in her?" [...] Would you eat my cum out of the girls?" In previous days' SMS messages, it was decided QUINNELL would meet the girls and I (purporting to be their mother) at a Wendy's. On June 30, 2023, I provided the Wendy's address to QUINNELL, "Wendy's 13606 N Penn Ave, okc". When I asked, "When will you get here", QUINNELL replied, "1 hour as per gps [...] What car should I look for?" I answered, "Mini van White". QUINNELL responded, "Ok. Thank you."

III. Arrest of QUINNELL

30. At approximately 4:20 p.m. on June 30, 2023, QUINNELL, driving a 2016

gray Dodge Ram 1500 truck⁵ bearing Texas license plate RNF-0185, arrived at the Wendy's located at 13606 N. Pennsylvania Avenue, Oklahoma City, Oklahoma, and parked next to a white Minivan. Once QUINNELL exited the truck and walked towards the entrance to Wendy's, he was taken into custody by law enforcement officers. In his shorts pocket was the Target Device, along with two bracelets, which were both seized incident his arrest.

31. During the custodial interview of QUINNELL, QUINNELL gave law enforcement consent to search the Target Device, and he confirmed his cell phone number as 530-715-4841. QUINNELL stated he sent child pornography to the mother of the girls, and that the Target Device contained child pornography. QUINNELL also explained he had traveled to Oklahoma City to have sex with the girls.

32. Based on my training and experience, individuals use their cell phone to communicate via SMS messaging and through messaging applications. Therefore, I believe there is probable cause to search the Target Device for fruits, evidence, and instrumentalities of the aforementioned offenses.

TECHNICAL TERMS

33. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular

⁵ This vehicle is registered to Lorraine Kathleen Wadsworth and Chad Allan Quinnell at an address located in Schertz, TX. This vehicle also matches a photo of a truck QUINNELL sent to me via SMS messaging on June 27, 2023, where he said, "I love driving my truck."

telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.

- b. Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras also include a screen

for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. Portable media player: A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.
- d. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A

GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna's latitude, longitude, and sometimes altitude with a high level of precision.

- e. IP Address: An Internet Protocol address (or simply "IP address") is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.
- f. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

34. Based on my training, experience, and research, I believe that the Target Device has capabilities that allow it to serve as a wireless telephone, digital camera, portable media player, and GPS navigation device. In my training and experience,

examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

35. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

36. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the Target Device was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the Device because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works

may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.

- d. The process of identifying the exact electronically stored information on a storage medium that is necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

37. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

38. *Manner of execution.* Because this warrant seeks only permission to examine a device already in law enforcement's possession, the execution of this warrant

does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

CONCLUSION

39. Based on the above information, there is probable cause to believe that the foregoing laws have been violated, and that evidence, fruits, and instrumentalities of those offenses are located on the Target Device.

40. Based upon the foregoing, I respectfully request that this Court issue a search warrant for the Target Device, described in Attachment A, authorizing the seizure of the items described in Attachment B to this affidavit.



Marisol Flores
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 5th day of July, 2023.



SHON T. ERWIN
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

DESCRIPTION OF THE TARGET DEVICE

- The cell phone seized from QUINNELL's person on June 30, 2023:
Samsung SM-S506DL (Galaxy A50) Cell phone bearing IMEI
357857102584226

ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

**DESCRIPTION OF ITEMS TO BE SEIZED AND SEARCHED
FROM THE TARGET DEVICE**

Contraband, evidence, fruits, and instrumentalities related to QUINNELL distributing child pornography in violation of 18 U.S.C. § 2252A(a)(2), possessing material containing child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B), knowingly attempting to persuade, induce, entice, and coerce a minor to engage in sexual activity in violation of 18 U.S.C. § 2422(b), and traveling in interstate commerce to engage in illicit sexual conduct in violation of 18 U.S.C. § 2423(b), in any form, including, but not limited to:

1. Videos, still images, and other recordings of visual depictions of minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256;
2. Written, typed, or verbal communications by or to QUINNELL that reflect how QUINNELL obtained, received, possessed, accessed with intent to view child pornography, or attempted to do the same;
3. Evidence of mobile applications or other programs used to hide, obtain, access, or store images of child pornography;
4. Evidence of who used, owned, or controlled the Target Device at the time the items described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, “chat,” instant messaging logs, photographs, and

correspondence;

5. Evidence of the times the Target Device was used;
6. Passwords, encryption keys, and other access devices that may be necessary to access the Target Device, applications on the Target Device, or remote storage services;
7. Records of or information about Internet Protocol addresses used by the Target Device;
8. Records of or information about the Target Device's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses;
9. Credit card information, including but not limited to bills and payment records related to the use of mobile applications and remote storage;
10. Information or correspondence pertaining to affiliation with any child exploitation websites or social media applications;
11. Any evidence of software that would allow others to control the Target Device, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
12. Evidence of the lack of such malicious software; and
13. Written, typed, or verbal communications by or to QUINNELL related to attempting to entice a minor to engage in sexual activity, or related to traveling to engage in illicit sexual conduct.

This warrant authorizes a review of electronic storage media and electronically stored information seized or copied pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the seized or copied electronic data to the custody and control of attorneys for the government and their support staff for their independent review.